Code	Total Loops	Loops in Service	Loops w/ Integrated DLC	% Total Loops on IDLC
AFTNMNAF	11,001	6,551	2,510	23%
ALLEMNAL	19,614	11,844	954	5%
ANOKMNAN	55,587	35,463	10,890	20%
APPLMNAP	2,250	1,290	-	0%
AUSTMNAB	24,347	15,401	1,354	6%
AVONMNVO	1,870	1,433	-	0%
BFLOMNBU	14,436	8,950	1,208	8%
BLANMNBL	63,118	38,753	6,906	11%
BLTNMNCE	28,436	11,330	192	1%
BLTNMNNO	56,075	24,919	468	1%
BLTNMNSO	46,415	28,460	2,681	6%
BMDJMNBE	24,188	7,678	4,732	20%
BRCTMNBC	41,109	22,197	1,033	3%
BRHMMNBR	3,912	2,710	-	0%
BRNMMNBA	2,225	1,626	138	6%
BRNRMNBR	30,675	21,093	4,244	14%
BRVLMNBU	43,748	25,631	4,683	11%
BTLKMNBA	3,472	1,963	-	0%
BUHLMNBU	1,696	840	-	0%
BWBKMNBI	2,580	1,611	-	0%
CHSHMNCS	6,302	4,024	-	0%
CHSTMNCH	2,312	1,568	-	0%
CKTNMNCR	8,417	5,298	-	0%
CLDNMNCA	3,483	903	-	0%
CLQTMNCA	14,232	10,737	1,996	14%
CLRNMNCO	4,053	2,680	-	0%
CLSPMNCB	4,835	3,498	-	0%
CMBRMNCA	11,299	6,572	900	8%
CMSTMNCO	1,072	606	-	0%
CNRPMNND	47,588	32,477	11,367	24%
COOKMNCO	3,256	2,306	-	0%
CRTOMNCB	2,925	2,158	672	23%
CRYSMNCR	47,271	26,664	1,317	3%
CSSLMNCL	4,497	3,146	-	0%
CTFDMNCH	3,554	2,265	568	16%
CTGVMNCG	25,273	15,052	1,524	6%
DLTHMNAF	19,372	12,942	-	0%
DLTHMNCB	15,089	10,594	-	0%
DLTHMNDB	3,545	2,567	-	0%
DLTHMNLA	9,764	7,238	1,433	15%
DLTHMNME	47,114	25,154	3,219	7%
DLTHMNPL	8,100	6,216	1,876	23%
DTLKMNDL	14,952	8,640	2,238	15%
EAGNMNLB	77,372	42,367	12,609	16%
EDPRMNEP	58,199	33,465	9,747	17%
EDPRMNGP	38,353	26,146	9,260	24%
EKRVMNER	24,378	14,654	6,838	28%
EVLTMNEV	7,327	4,526	-	0%
EXCLMNEX	26,221	17,507	4,914	19%
FNLDMNFI	506	475	-	0%
FOLYMNFO	3,494	2,457	-	0%
FRBLMNFA	21,524	13,001	1,440	7%
FRDLMNFR	26,555	16,131	-	0%
FRFLMNFB	18,241	6,944	2,729	15%
FRLKMNFL	16,506	11,952	2,569	16%

Minnesota Statistics

% Total Loops on IDLC	8%
Highest % IDLC in Wire Center EKRVMNER	28%
Loops on IDLC	264,341
Total Loops	3,408,745
Loops in COs w/ 20%+ IDLC	431,477

IDLC Concentration	Number of Wire Centers	Number of Loops
0% - 20%	139	2,977,268
21% - 40%	15	431,477
41% - 60%	0	-
61% - 80%	0	-
81% - 100%	0	0
Totals	154	3,408,745

Qwest data for Minnesota shows that, state-wide, 8% of total loops are served by IDLC, with one wire center exhibiting an IDLC concentration of 28%. Out of the total 154 Qwest wire centers in Minnesota, fifteen (15) wire centers have IDLC concentrations of 20% or higher (serving 431,477 loops). All of these wire centers have IDLC concentrations between 21%-40%. The diagram below depicts the wire-center specific IDLC data that is contained in the far left table, by CLLI code.

Percent IDLC in wire centers for Minnesota
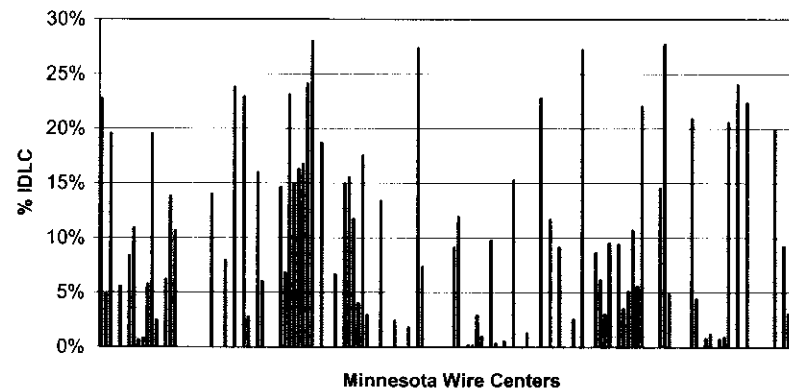
http://www.uswest.com/cgi-bin/iconn/dlc.cg

GDMRMNGM	3,544	2,859	417	12%
GDRPMNGR	18,087	13,549	729	4%
GLVLMNGL	1,638	907	288	18%
GLVYMNOR	87,565	43,846	2,595	3%
GLWDMNGL	3,914	2,895	-	0%
GYLRMNGA	2,616	1,792	-	0%
HAMLMNHB	5,779	3,398	776	13%
HBNGMNHI	18,718	10,763	-	0%
HLFRMNCO	1,419	1,025	-	0%
HNCKMNHI	3,913	2,482	96	2%
HNNGMNHE	2,079	998	-	0%
HNVRMNHB	2,474	1,577	-	0%
HPKNMNHO	66,711	36,334	1,214	2%
HWLYMNHA	2,129	1,382	-	0%
ISLKMNIL	2,955	2,355	810	27%
ISNTMNIS	8,218	5,793	607	7%
JCSNMNJA	4,475	3,098	-	0%
KEWTMNKE	1,351	656	-	0%
LESRMNLS	5,031	3,273	-	0%
LTFDMNLI	8,454	3,500	-	0%
LTFLMNLF	10,763	7,744	-	0%
LVRNMNLU	5,391	1,825	-	0%
MHNMMNMA	3,634	2,030	332	9%
MOLKMNML	3,127	2,317	375	12%
MORAMNMO	9,217	6,835	-	0%
MPLSMN07	52,019	20,654	105	0%
MPLSMNBB	47,653	29,447	77	0%
MPLSMNBE	69,947	47,953	2,054	3%
MPLSMNDT	189,104	67,548	1,920	1%
MPLSMNFR	43,561	19,920	-	0%
MPLSMNFS	26,537	14,688	2,595	10%
MPLSMNGE	42,670	25,187	152	0%
MPLSMNPE	20,593	11,923	-	0%
MPLSMNPI	52,625	33,698	288	1%
MPLSMNTF	46,188	32,124	-	0%
MPWDMNMA	104,675	54,178	16,001	15%
MRBLMNMA	1,888	840	-	0%
MRRSMNMO	5,852	2,297	-	0%
MRSHMNMA	14,773	4,923	191	1%
MTIRMNMI	1,028	606	-	0%
MTVDMNMO	7,390	4,688	-	0%
NBRNMNNB	8,509	5,223	1,945	23%
NCLTMNNC	1,013	355	-	0%
NRFDMNNO	15,690	10,890	1,837	12%
NSHWMNNA	3,120	1,975	-	0%
NSPLMNPR	47,503	27,741	4,349	9%
NSSWMNNI	5,790	3,803	-	0%
NVRRMNNA	4,549	3,068	-	0%
NWBTMNCL	55,581	28,709	1,412	3%
OGLVMNOA	1,619	1,197	-	0%
OKGVMNOG	12,974	9,478	3,536	27%
OLIVMNOL	4,483	2,978	-	0%
ORVLMNOR	3,680	2,310	-	0%
OWTNMNOW	25,045	16,403	2,170	9%

PKRPMNPR	9,693	5,118	595	6%
PLMOMNFE	43,727	23,721	1,314	3%
PNCYMNPC	7,131	5,460	678	10%
PPSTMNPI	5,180	2,039	-	0%
PRTNMNPR	12,475	6,944	1,176	9%
RCFDMN66	35,419	24,150	1,250	4%
RCFRMNRO	7,101	3,388	363	5%
RDFLMNRA	6,269	2,328	672	11%
RDWNMNRW	17,481	11,982	970	6%
ROCHMNRO	108,779	63,605	24,014	22%
RSCYMNRC	3,788	2,635	-	0%
RYTNMNRN	1,918	1,448	-	0%
SABNMNSA	838	556	-	0%
SDVLMNSO	18,810	12,722	2,737	15%
SHKPMNSH	31,996	21,379	8,885	28%
SHVWMNRI	57,130	32,661	2,795	5%
SKCTMNSC	6,026	2,010	-	0%
SLBAMNSA	2,820	1,902	-	0%
SNDSMNSA	2,752	1,842	-	0%
SPLSMNST	4,535	2,887	-	0%
STCDMNTO	91,849	41,368	19,244	21%
STCHMNSC	4,296	2,545	190	4%
STJSMNSJ	5,181	2,697	-	0%
STPLMNBE	54,010	28,328	434	1%
STPLMNEM	34,460	20,603	417	1%
STPLMNHB	29,111	17,480	-	0%
STPLMNMI	64,223	34,262	469	1%
STPLMNMK	146,686	61,523	1,316	1%
STPRMNSP	12,106	5,067	2,496	21%
STVLMNST	5,496	3,303	-	0%
STWRMNST	28,303	17,076	6,819	24%
SWVLMNSV	1,080	652	-	0%
TOFTMNTB	1,661	1,169	372	22%
TRACMNTR	2,916	888	-	0%
TRFLMNTH	10,997	7,110	-	0%
VRGNMNVI	16,378	10,313	-	0%
WADNMNWA	5,811	3,620	-	0%
WASCMNWA	9,549	4,309	-	0%
WBLKMNWB	41,920	26,907	8,369	20%
WBSHMNWA	4,188	2,802	-	0%
WINOMNWI	30,441	13,684	2,805	9%
WLMRMNWI	20,319	11,185	627	3%
WNDMMNWI	5,494	3,786	-	0%
WSPLMNWS	56,960	31,992	4,782	8%
WYZTMNWA	38,446	24,142	4,472	12%

CLLI Code	Total Loops	Loops in Service	Loops w/ Integrated DLC	% Total Loops on IDLC
AMSTMTMA	1,140	892	284	25%
ANCNMTMA	7,205	4,630	-	0%
BLDRMTMA	1,504	972	-	0%
BLGRMTMA	10,768	7,696	4,996	46%
BLNGMTMA	77,719	40,770	14,790	19%
BLNGMTWE	31,016	21,466	6,536	21%
BRDGMTMA	1,196	701	-	0%
BUTTMT09	22,458	11,698	1,528	7%
BUTTMT18	9,949	6,736	1,865	19%
BZMNMTMA	47,555	28,572	17,085	36%
CKCYMTMA	379	296	-	0%
CLMBMTMA	3,413	1,992	-	0%
CLNCMTMA	1,796	1,129	-	0%
CLPKMTMA	860	563	-	0%
CLSTMTMA	2,616	1,185	96	4%
CNFYMTMA	1,406	918	-	0%
CNRDMTMA	3,749	1,093	-	0%
CRVSMTMA	4,486	3,383	-	0%
CSCDMTMA	1,564	1,016	96	6%
CTBNMTMA	4,161	2,358	-	0%
DLLNMTMA	6,243	4,021	-	0%
DRBYMTMA	2,786	1,981	-	0%
DRLDMTMA	4,159	2,549	-	0%
DTTNMTMA	473	279	-	0%
EGPKMTMA	824	495	-	0%
EHLNMTMA	6,492	4,161	1,765	27%
FCTWMTMA	2,832	1,996	1,368	48%
FRMBMTMA	600	391	-	0%
FRSYMTMA	2,624	653	-	0%
FRVWMTMA	1,559	393	-	0%
GLGTMTMA	1,815	1,229	860	47%
GLNDMTMA	7,115	1,396	-	0%
GRFLMTMA	65,615	37,417	12,472	19%
GRNRMTMA	1,744	1,107	-	0%
HAVRMTMA	11,057	6,578	-	0%
HLNAMTMA	45,610	25,331	8,796	19%
HLNAMTNO	4,268	3,196	1,022	24%
HMTNMTMA	10,391	7,699	-	0%
HRDNMTMA	3,663	2,392	-	0%
JOLTMTMA	1,564	1,138	-	0%
LARLMTMA	6,727	4,817	-	0%
LOLOMTMA	6,563	4,295	2,653	40%
LVTNMTMA	9,771	7,108	-	0%
LWTWMTMA	8,568	5,530	-	0%
MLCYMTMA	9,639	3,411	-	0%
MLTWMTMA	2,105	1,315	192	9%
MNHTMTMA	1,937	1,284	95	5%
MSSLMTMA	66,881	37,930	18,911	28%
MSSLMTSO	8,196	5,429	2,133	26%
OPRTMTMA	669	382	-	0%
PRAYMTMA	1,425	1,007	-	0%
PRCYMTMA	1,276	795	-	0%
RBRTMTMA	725	385	-	0%
RDLGMTMA	4,283	3,209	-	0%
SDNYMTMA	9,083	1,240	-	0%

Montana Statistics

% Total Loops on IDLC	17%
Highest % IDLC in Wire Center SHPHMTMA	52%
Loops on IDLC	99,121
Total Loops	588,829
Loops in COs w/ 20%+ IDLC	189,864

IDLC Concentration	Number of Wire Centers	Number of Loops
0% - 20%	60	398,965
21% - 40%	8	172,111
41% - 60%	4	17,753
61% - 80%	0	-
81% - 100%	0	0
Totals	72	588,829

Qwest data for Montana shows that, state-wide, 17% of total loops are served by IDLC, with one wire center exhibiting an IDLC concentration of 52%. Out of the total 72 Qwest wire centers in Montana, twelve (12) wire centers have IDLC concentrations of 20% or higher (serving 189,864 loops). Eight (8) of these wire centers have IDLC concentrations of between 21%-40% and four (4) of these wire centers have IDLC concentrations of between 41%-60%. The diagram below depicts the wire-center specific IDLC data that is contained in the far left table, by CLLI code.

Percent IDLC in wire centers for Montana

http://www.uswest.com/cgi-bin/iconn/dlc.cg
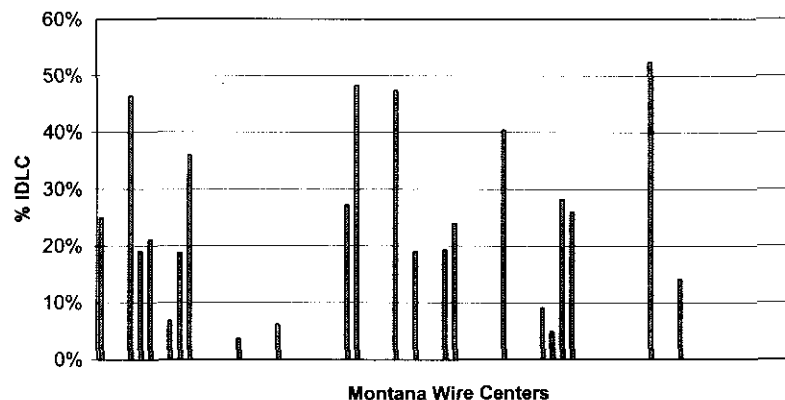
Starkey/Morrison Declaration, Exhibit 7
MCI Comments
WC Docket 04-313
October 4, 2004

SHLBMTMA	2,976	1,069	-	0%
SHPHMTMA	2,338	1,597	1,227	52%
STMYMTMA	827	441	-	0%
STVLMTMA	6,793	4,950	-	0%
THFKMTMA	2,469	1,801	351	14%
TRRYMTMA	703	59	-	0%
TWNSMTMA	2,855	2,041	-	0%
ULM-MTMA	698	387	-	0%
VCTRMTMA	2,579	1,690	-	0%
VGHNMTMA	1,462	1,081	-	0%
WGLCMTMA	1,253	757	-	0%
WHTHMTMA	2,983	1,945	-	0%
WIBXMTMA	1,143	193	-	0%
WLCKMTMA	538	342	-	0%
WLSLMTMA	634	413	-	0%
WRSPMTMA	973	228	-	0%
WYLWMTMA	3,383	2,284	-	0%

CLLI Code	Total Loops	Loops In Service	Loops w/ Integrated DLC	% Total Loops on IDLC
BLFDNDBC	2,958	1,030	-	0%
BSMRNDBC	67,691	39,558	7,707	11%
CSLTNDBC	2,606	1,489	64	2%
DCSNNDBC	22,128	6,642		0%
FARGNDBC	111,172	65,016	11,290	10%
GDFRNDBC	55,477	31,877	5,021	9%
GFABNDBC	6,030	1,850	-	0%
GFTNNDBA	6,021	3,164	-	0%
GRNRNDBC	731	476	-	0%
HLBONDBC	2,649	683	-	0%
HTTNNDBC	1,527	689	-	0%
JMTWNDBC	18,503	9,582	160	1%
KNDRNDBC	1,365	861	-	0%
LNRDNDMW	975	322	-	0%
LRMRNDBA	2,278	1,132	-	0%
MANVNDBC	916	396	-	0%
MINTNDBA	2,200	772	-	0%
MNDNNDBA	16,218	10,479	418	3%
MYVLNDBC	3,689	1,151	-	0%
NWODNDBC	1,695	820	-	0%
RYNLNDBC	1,228	643	-	0%
THSNNDBC	1,485	640	-	0%
VLCYNDBC	8,016	4,939	-	0%
WFRGNDBC	34,932	19,171	8,647	25%
WHTNNDBC	13,326	7,472	-	0%

North Dakota Statistics

% Total Loops on IDLC	9%
Highest % IDLC in Wire Center WFRGNDBC	25%
Loops on IDLC	33,307
Total Loops	385,816
Loops in COs w/ 20%+ IDLC	34,932

IDLC Concentration	Number of Wire Centers	Number of Loops
0% - 20%	24	350,884
21% - 40%	1	34,932
41% - 60%	0	-
61% - 80%	0	-
81% - 100%	0	0
Totals	25	385,816
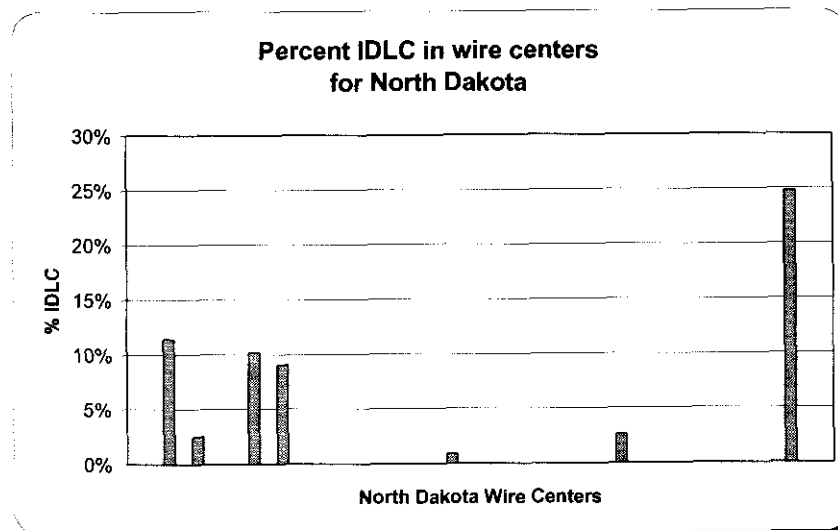
Qwest data for North Dakota shows that, state-wide, 9% of total loops are served by IDLC, with one wire center exhibiting an IDLC concentration of 25%. Out of the total 25 Qwest wire centers in North Dakota, one (1) wire center has an IDLC concentration of between 21%-40%. The diagram below depicts the wire-center specific IDLC data that is contained in the far left table, by CLLI code.

Percent IDLC in wire centers for North Dakota

North Dakota Wire Centers

http://www.uswest.com/cgi-bin/iconn/dlc.cg

Code	Total Loops	Loops in Service	Loops w/ Integrated DLC	% Total Loops on IDLC
ALNCNENW	8,329	5,118	-	0%
ANWONENW	2,890	1,044	-	0%
ATLNNENW	227	107	-	0%
ATSNNENW	2,855	1,457	-	0%
AXTLNENW	912	487	-	0%
BGSPNENW	936	505	-	0%
BGTNNECO	2,187	1,061	-	0%
BRKBNENW	4,688	2,968	-	0%
BRPTNENW	2,971	1,555	-	0%
CAIRNENW	1,017	644	-	0%
CHDRNENW	6,997	4,774	-	0%
CKSNNEUW	977	599	-	0%
CNCYNENW	2,815	1,726	-	0%
CRFRNENW	2,208	1,277	-	0%
ELKHNENW	11,410	3,830	2,275	20%
ELWDNENW	1,841	1,120	-	0%
EMCKNENW	1,166	767	-	0%
EMSNNENW	988	646	-	0%
FRMTNENW	24,311	16,531	-	0%
FRWLNENW	300	161	-	0%
FUTNNENW	1,881	994	-	0%
GDISNENW	45,735	26,365	2,495	5%
GRETNENW	5,363	2,669	-	0%
GTBGNENW	4,038	2,497	-	0%
HLDGNENW	5,878	3,903	-	0%
HMPHNENW	1,674	1,141	-	0%
HOMRNENW	706	521	-	0%
HRSNNENW	731	379	-	0%
HWLSNENW	1,092	579	-	0%
LARLNENW	1,196	857	-	0%
LPCYNENW	1,801	933	-	0%
LXTNNENW	7,255	4,771	-	0%
LYNSNENW	1,383	812	-	0%
MCCKNENW	8,944	5,747	-	0%
MINDNENW	3,823	2,031	-	0%
NPLTNENW	25,283	16,018	613	2%
NRFLNENW	24,996	16,272	-	0%
OGLLNENW	6,997	4,113	-	0%
OKLDNEUW	2,207	1,092	-	0%
OMAHNE78	26,940	10,962	342	1%
OMAHNE84	56,848	23,944	6,044	11%
OMAHNE90	59,617	22,898	-	0%
OMAHNEBE	34,197	10,992	4,121	12%
OMAHNECE	91,641	22,190	8,368	9%
OMAHNEFO	87,507	19,732	14,814	17%
OMAHNEFW	36,276	14,273	-	0%
OMAHNEHA	62,696	16,843	8,881	14%

Nebraska Statistics

% Total Loops on IDLC	5%
Highest % of IDLC in Wire CenterELKHNENW	20%
Loops on IDLC	47,953
Total Loops	943,317
Loops in COs w/ 20%+ IDLC	0

IDLC Concentration	Number of Wire Centers	Number of Loops
0% - 20%	69	943,317
21% - 40%	0	0
41% - 60%	0	0
61% - 80%	0	0
81% - 100%	0	0
Totals	69	943,317

Qwest data for Nebraska shows that, state-wide, 5% of total loops are served by IDLC, with one wire center exhibiting an IDLC concentration of 20%. Out of the total 69 Qwest wire centers in Nebraska, zero (0) wire centers have IDLC concentrations of greater than 20%. The diagram below depicts the wire-center specific IDLC data that is contained in the far left table, by CLLI code.

Percent IDLC in wire centers for Nebraska
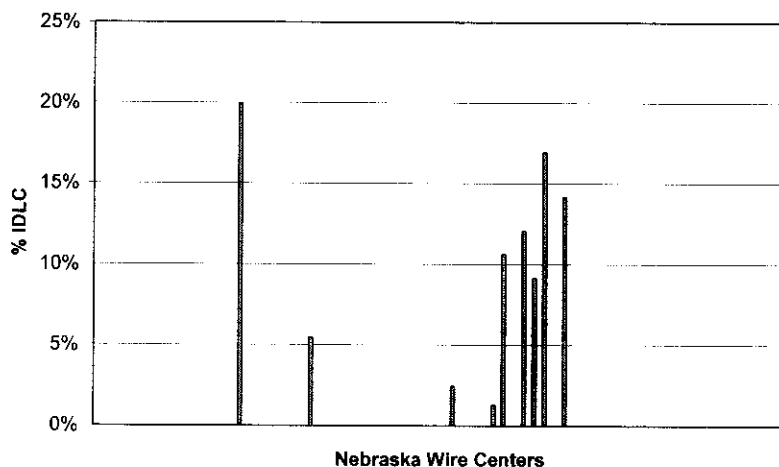
http://www.uswest.com/cgi-bin/iconn/dlc.cg

OMAHNEIZ	51,067	18,027	-	0%
OMAHNENW	105,287	31,022	-	0%
OMAHNEOS	37,807	13,551	-	0%
ONELNENW	4,998	3,273	-	0%
OXFRNENW	1,215	623	-	0%
PLGRNENW	608	385	-	0%
PNDRNEUW	2,077	1,167	-	0%
RNDHNENW	1,447	787	-	0%
SCHLNENW	4,578	3,045	-	0%
SDNYNENW	6,464	4,297	-	0%
SLCKNENW	848	390	-	0%
SPFDNENW	2,803	1,502	-	0%
SSCYNENW	11,949	7,399	-	0%
STLBNENW	607	404	-	0%
STPLNENW	2,671	1,589	-	0%
TKMHNENW	2,467	850	-	0%
VLLYNENW	3,644	1,800	-	0%
VLNTNENW	3,896	2,847	-	0%
WAYNNEUW	5,429	3,750	-	0%
WDRVNENW	1,451	941	-	0%
WKFDNENW	1,381	1,054	-	0%
WSPNNENW	3,893	2,647	-	0%

Qwest data for New Mexico shows that, state-wide, 15% of total loops are served by IDLC, with one wire center exhibiting an IDLC concentration of 74%. Out of the total 65 Qwest wire centers in New Mexico, twenty-one (21) wire centers have IDLC concentrations greater than 20% (serving 360,247 loops). Sixteen (16) of these wire centers have IDLC concentrations of between 21%-40%, three (3) of these wire centers have IDLC concentrations of between 41%-60%, and two (2) wire centers have IDLC concentrations between 61%-80%. The diagram below depicts the wire-center specific IDLC data that is contained in the far left table, by CLLI code.

CLLI Code	Total Loops	Loops in Service	Loops w/ Integrated DLC	% Total Loops on IDLC
ALBQNMAC	51,834	34,498	2,314	4%
ALBQNMCR	56,256	38,683	18,989	34%
ALBQNMEA	66,567	34,783	21	0%
ALBQNMMA	79,406	38,081	381	0%
ALBQNMNE	98,271	66,241	9,773	10%
ALBQNMNO	32,420	21,835	2,846	9%
ALBQNMRR	34,982	23,704	11,518	33%
ALBQNMSM	55,325	31,943	273	0%
ALBQNMSW	22,243	14,416	894	4%
ALBQNMWE	41,881	27,958	11,261	27%
ALMGNMMA	29,196	18,795	5,338	18%
ALMGNMWE	4,642	1,654	-	0%
ANFRNMMA	4,803	3,716	1,342	28%
ANTHNMMA	7,005	4,663	1,805	26%
ARTSNMMA	11,516	7,477	-	0%
AZTCNM03	10,786	7,945	1,688	16%
AZTCNMBL	9,738	7,534	1,786	18%
BELNNMMA	16,058	10,576	3,593	22%
BRNLNMMA	16,446	11,795	7,112	43%
BYRDNMMA	4,582	2,985	328	7%
CHAPNMMA	4,596	3,412	1,247	27%
CLVSNMMA	25,501	16,816	970	4%
CLVSNMWE	4,205	1,639	-	0%
CMRNNMMA	1,353	849	104	8%
DMNGNMMA	13,385	10,199	1,551	12%
ESTNNMMA	3,539	2,277	1,085	31%
FRTNNMMA	41,672	28,250	5,325	13%
FRTNNMWE	5,258	3,788	527	10%
GLLPNMEA	1,604	1,061	-	0%
GLLPNMFW	993	595	-	0%
GLLPNMMA	21,345	14,035	2,284	11%
GRNTNMMA	11,442	7,513	1,031	9%
HATCNMMA	3,577	2,255	597	17%
LAACNM01	3,977	2,662	747	19%
LAMSNMMA	3,512	2,760	899	26%
LSALNMMA	15,373	8,039	739	5%
LSALNMWR	4,307	2,966	-	0%
LSCRNM16	10,112	7,793	7,148	71%
LSCRNMMA	54,397	38,263	10,823	20%
LSCRNMTS	22,738	15,125	7,039	31%
LSLNNMMA	19,963	13,975	6,758	34%
LSLNNMNO	5,865	4,060	-	0%
LSVGNMMA	16,846	10,939	2,537	15%
MRTYNMMA	5,398	3,775	1,410	26%
MTNRNMMA	1,730	1,055	117	7%
PNBLNMMA	1,788	1,358	343	19%
PNSCNMMA	1,980	1,430	384	19%
PTLSNMMA	9,956	6,832	-	0%
QUSTNMMA	2,891	1,783	287	10%
RATNNMMA	7,003	5,278	60	1%
RDRVNMMA	2,750	1,422	239	9%
RSWLNMMA	41,135	25,924	2,648	6%

New Mexico Statistics

% Total Loops on IDLC	15%
Highest % IDLC in Wire Center SNFENM58	74%
Loops on IDLC	191,226
Total Loops	1,244,501
Loops in COs w/ 20%+ IDLC	360,247

IDLC Concentration	Number of Wire Centers	Number of Loops
0% - 20%	44	884,254
21% - 40%	16	297,524
41% - 60%	3	45,048
61% - 80%	2	17,675
81% - 100%	0	
Totals	65	1,244,501

Percent IDLC in wire centers for New Mexico

New Mexico Wire Centers

http://www.uswest.com/cgi-bin/iconn/dlc.cg

RSWLNMSO	3,227	1,968	-	0%
SCRRNMMA	8,782	5,673	249	3%
SLCYNMMA	15,133	11,145	1,759	12%
SNFENM58	7,563	5,557	5,595	74%
SNFENMMA	71,998	42,921	10,304	14%
SNFENMNO	5,235	3,507	1,089	21%
SNFENMSW	49,047	29,972	13,388	27%
SNTSNMAA	9,604	6,645	4,908	51%
SPRNNMMA	1,738	970	49	3%
TAOSNMMA	18,240	13,017	4,652	26%
TAOSNMNO	4,271	3,148	925	23%
TCMCNMMA	6,517	4,168	-	0%
TJRSNMMA	18,998	14,154	10,147	53%

CLLI Code	Total Loops	Loops in Service	Loops w/ Integrated DLC	% Total Loops on IDLC
ADAROR21	3,536	1,997	1,840	52%
ALBYOR63	49,693	29,421	1,648	3%
ASLDOR55	26,596	15,414	3,042	11%
ASTROR64	14,865	8,800	637	4%
ATHNOR56	2,474	1,755	-	0%
BAKROR23	12,415	7,392	1,479	12%
BENDOR24	81,007	55,509	20,873	26%
BLBTOR01	3,170	1,812	-	0%
BLRVOR53	1,807	1,147	-	0%
BURLOR62	2,274	1,409	-	0%
CLCKOR53	558	379	-	0%
CLVROR01	2,846	1,580	573	20%
CNBHOR64	3,726	2,735	-	0%
CNPNOR29	14,229	9,210	-	0%
CRVSOR65	53,031	28,365	697	1%
CTGVOR53	14,329	9,453	1,966	14%
DLLSOR58	13,232	9,555	731	6%
EUGNOR28	44,377	29,661	9,575	22%
EUGNOR53	136,788	78,418	13,185	10%
FLCYOR58	931	589	-	0%
FLRNOR53	14,119	9,953	2,371	17%
GLHLOR55	4,176	2,628	-	0%
GRPSOR29	60,626	36,954	78	0%
HMTNOR56	18,612	11,320	235	1%
INDPOR58	12,346	7,401	-	0%
JCVLOR56	7,610	3,826	1,779	23%
JFSNOR63	3,067	2,039	-	0%
JNCYOR51	12,435	8,142	1,834	15%
KLFLOR54	45,974	28,449	774	2%
LAPIOR52	7,517	5,797	-	0%
LEBGOR54	1,895	1,309	-	0%
LKOSOR62	42,715	25,114	6,652	16%
LWLLOR53	2,352	1,817	469	20%
MDFDOR33	85,729	48,835	2,136	2%
MDRSOR52	7,596	5,089	-	0%
MLTNOR56	8,451	4,975	-	0%
MLWKOR17	60,652	36,506	5,929	10%
MPTNOR54	1,286	785	-	0%
MRCLOR53	1,709	1,044	-	0%
NPLNOR62	4,552	2,696	-	0%
NWPTOR35	14,136	8,373	1,846	13%
NYSSORXC	4,206	2,397	668	16%
OKRGOR01	3,458	2,323	-	0%
ONTRORXC	13,308	8,368	960	7%
ORCYOR18	61,478	41,434	3,078	5%
ORSLORXC	880	517	288	33%
PHNXOR55	12,087	8,368	2,340	19%
PNTNOR56	21,558	12,924	1,188	6%
PRVLOR53	13,872	9,574	560	4%
PTLDOR02	38,925	21,861	6,102	16%
PTLDOR08	31,410	21,513	5,834	19%
PTLDOR11	90,902	57,665	13,864	15%
PTLDOR12	93,192	52,956	12,693	14%
PTLDOR13	99,610	52,230	1,558	2%
PTLDOR14	64,720	36,269	21	0%

Oregon Statistics

% Total Loops on IDLC	8%
Highest % IDLC in Wire Center ADAROR21	52%
Loops on IDLC	186,085
Total Loops	2,221,823
Loops in COs w/ 20%+ IDLC	183,653

IDLC Concentration	Number of Wire Centers	Number of Loops
0% - 20%	74	2,038,170
21% - 40%	5	146,259
41% - 60%	2	37,394
61% - 80%	0	-
81% - 100%	0	0
Totals	81	2,221,823

Qwest data for Oregon shows that, state-wide, 8% of total loops are served by IDLC, with one wire center exhibiting an IDLC concentration of 52%. Out of the total 81 Qwest wire centers in Oregon, seven (7) wire centers have IDLC concentrations greater than 20% (serving 183,653 loops). Five (5) of these wire centers have IDLC concentrations of between 21%-40% and two (2) of these wire centers have IDLC concentrations of between 41%-60%. The diagram below depicts the wire-center specific IDLC data that is contained in the far left table, by CLLI code.

Percent IDLC in wire centers for Oregon
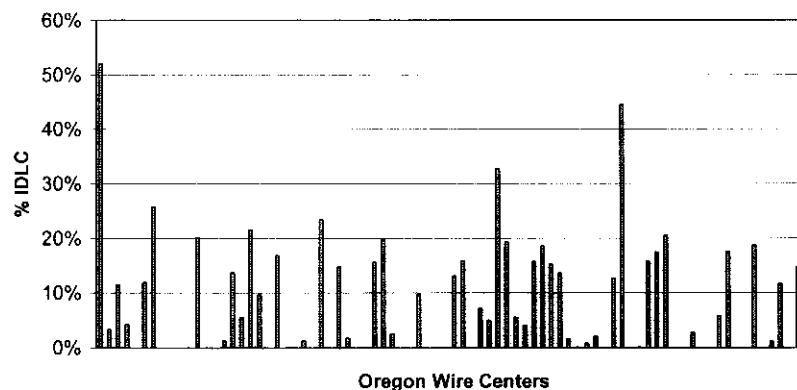
http://www.uswest.com/cgi-bin/iconn/dlc.cg

PTLDOR17	59,601	35,685	471	1%
PTLDOR18	57,516	38,102	1,199	2%
PTLDOR69	200,161	77,885	-	0%
RANROR01	6,021	3,199	763	13%
RDMDOR01	33,858	20,272	15,077	45%
RGRVOR55	8,167	5,160	-	0%
RSBGOR57	37,099	23,985	29	0%
SALMOR58	154,831	94,028	24,346	16%
SALMOR59	34,847	23,962	6,074	17%
SESDOR64	12,385	8,238	2,541	21%
SLTZOR66	1,792	1,353		0%
SPFDOR01	58,904	38,353	-	0%
SPRVOR02	10,136	7,299	280	3%
SSTROR01	5,104	3,676	-	0%
STFDOR56	1,788	936		0%
STHNOR40	14,979	10,483	857	6%
STHROR58	10,092	6,987	1,769	18%
TOLDOR66	4,404	2,611	-	0%
UMTLOR57	6,645	3,997	-	0%
VALEORXC	3,753	2,146	704	19%
VENTOR54	9,804	5,751	-	0%
WDBNOR59	19,025	12,231	216	1%
WNTNOR57	12,130	8,199	1,421	12%
WRSPOR52	3,224	1,833	-	0%
WRTNOR64	5,673	3,970	835	15%
WSPTOR64	839	368	-	0%

CLLI Code	Total Loops	Loops In Service	Loops w/ Integrated DLC	% Total Loops on IDLC
ABRDSDCO	32,233	13,063	22	0%
ARTNSDCO	1,960	1,207	-	0%
BLFRSDCO	6,090	1,868	557	9%
BLHKSDCE	6,000	3,179		0%
CAVRSDCO	421	250	-	0%
CHBLSDCO	4,263	1,522	-	0%
CLMNSDCO	895	412	-	0%
CNTNSDCO	3,888	1,070		0%
DDWDSDCO	5,618	1,497	-	0%
DESMSDCO	1,750	1,072	-	0%
ELPNSDCO	2,245	585	-	0%
FLNDSDCO	3,222	1,323	-	0%
FTPRSDCE	2,910	1,515		0%
HLCYSDCO	3,542	2,084	-	0%
HRBGSDCO	2,749	1,032	-	0%
HURNSDCO	15,818	8,489	-	0%
IRQSSDCO	673	337	-	0%
LEADSDCO	5,471	1,249	-	0%
LKPRSDCO	1,204	659	-	0%
MCINSDCO	594	255	-	0%
MDSNSDCE	8,394	3,445	-	0%
MLBNSDCO	6,475	3,417	-	0%
MLLRSDCO	3,351	1,572	-	0%
MRTWSDCO	557	229	-	0%
MTCHSDCO	17,000	10,105	-	0%
PIRRSDCO	21,222	13,772	611	3%
RDFDSDCO	5,048	2,610	-	0%
RPCYSDCO	67,497	27,889	5,913	9%
RPVYSDCO	6,924	2,776	-	0%
SPRFSDCO	12,940	4,594	1,956	15%
STRGSDCO	8,663	2,300	-	0%
SXFLSDCO	107,708	51,121	4,876	5%
SXFLSDSE	5,990	3,118	-	0%
SXFLSDSW	19,968	10,700	384	2%
TEA-SDCO	2,474	1,068	576	23%
TMLKSDCO	1,033	533	-	0%
VOLGSDCO	2,280	1,239	-	0%
VRMLSDCO	13,781	7,371	86	1%
WHWDSDCO	1,515	249	-	0%
WRWKSDCO	8,975	3,247	-	0%
WTTWSDCO	21,781	11,584	2,422	11%
YNTNSDCO	16,433	6,478	2,664	16%

South Dakota Statistics

% Total Loops on IDLC	4%
Highest % IDLC in Wire Center TEA-SDCO	23%
Loops on IDLC	20,067
Total Loops	461,555
Loops in COs w/ 20%+ IDLC	2,474

Qwest data for South Dakota shows that, state-wide, 4% of total loops are served by IDLC, with one wire center exhibiting an IDLC concentration of 23%. Out of the total 42 Qwest wire centers in South Dakota, one (1) wire center has an IDLC concentration between 21%-40% (serving 2,474 loops). The diagram below depicts the wire-center specific IDLC data that is contained in the far left table, by CLLI code.

IDLC Penetration	Number of Wire Centers	Number of Loops
0% - 20%	41	459,081
21% - 40%	1	2,474
41% - 60%	0	-
61% - 80%	0	-
81% - 100%	0	0
Totals	42	461,555

Percent IDLC in wire centers for South Dakota
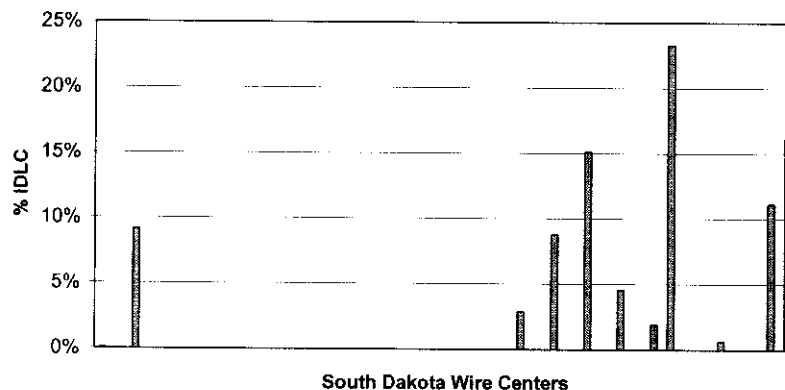
http://www.uswest.com/cgi-bin/iconn/dlc.cg

CLLI Code	Total Loops	Loops in Service	Loops w/ Integrated DLC	% Total Loops on IDLC
ALTAUTMA	1,119	715	-	0%
AMFKUTMA	26,316	18,174	1,176	4%
BEVRUTMA	3,565	2,118	-	0%
BGCYUTMA	14,275	10,387	254	2%
BNHDUTMA	1,963	881	-	0%
BNTFUTMA	53,759	36,817	755	1%
CDCYUTMA	25,838	15,556	2,974	12%
CLFDUTMA	69,092	43,431	323	0%
CRNNUTMA	1,073	673	-	0%
CTWDUTMA	41,831	27,611	581	1%
DRPRUTMA	60,623	38,105	23,953	40%
FRTNUTMA	9,236	6,720	-	0%
GTVLUTMA	4,306	2,839	-	0%
HBCYUTMA	15,369	8,499	4,592	30%
HLDYUTMA	43,568	27,702	-	0%
HNVIUTMA	4,716	3,199	-	0%
HRCNUTMA	9,372	6,399	3,128	33%
HYRMUTMA	6,270	4,479	-	0%
KRNSUTMA	83,829	47,758	3,767	4%
KYVLUTMA	36,085	26,982	4,939	14%
LEDSUTMA	1,449	639	192	13%
LEHIUTMA	16,928	12,136	2,038	12%
LOGNUTMA	42,075	27,547	4,723	11%
LYTNUTMA	4,444	2,970	-	0%
MAGNUTNM	17,648	9,602	1,680	10%
MDVAUTMA	77,800	49,001	689	1%
MONRUTMA	2,540	1,671	-	0%
MRGNUTMA	3,057	2,080	-	0%
MRRYUTMA	89,729	48,725	4,994	6%
MTGNUTMA	1,529	1,115	-	0%
NEPHUTMA	4,941	3,429	-	0%
OGDNUTMA	69,732	34,606	3,507	5%
OGDNUTNO	19,960	12,452	2,156	11%
OGDNUTSO	19,197	12,559	94	0%
OGDNUTWE	15,783	11,227	-	0%
OREMUTMA	70,788	35,696	13,448	19%
PLGVUTMA	18,690	13,454	-	0%
PRCYUTMA	41,794	24,386	13,755	33%
PROVUTMA	65,372	29,933	2,012	3%
PRWNUTMA	2,505	1,737	-	0%
PYSNUTMA	9,705	6,845	86	1%
RCFDUTMA	7,529	5,330	-	0%
RCMDUTMA	2,587	1,889	-	0%
RVTNUTMA	40,846	26,507	18,254	45%
SALMUTMA	4,414	3,036	-	0%
SALNUTMA	3,213	2,088	-	0%
SLKCUTEA	50,441	27,696	991	2%
SLKCUTMA	166,703	72,114	-	0%
SLKCUTSO	86,647	47,145	94	0%
SLKCUTWE	53,663	27,683	2,671	5%
SMFDUTMA	7,063	5,460	-	0%
SNTQUTMA	3,079	2,347	-	0%
SPDLUTMA	1,503	956	-	0%
SPFKUTMA	14,255	10,178	1,127	6%

Utah Statistics

% Total Loops on IDLC	10%
Highest % IDLC in Wire Center STGRUTMA	53%
Loops on IDLC	169,842
Total Loops	1,678,727
Loops in COs w/ 20%+ IDLC	259,643

IDLC Concentration	Number of Wire Centers	Number of Loops
0% - 20%	51	1,419,084
21% - 40%	4	127,158
41% - 60%	5	132,485
61% - 80%	0	-
81% - 100%	0	0
Totals	60	1,678,727

Qwest data for Utah shows that, state-wide, 10% of total loops are served by IDLC, with one wire center exhibiting an IDLC concentration of 53%. Out of the total 60 Qwest wire centers in Utah, nine (9) wire centers have IDLC concentrations greater than 20% (serving 259,643 loops). Four (4) of these wire centers have IDLC concentrations between 21%-40% and five (5) of these wire centers have IDLC concentrations between 41%-60%. The diagram below depicts the wire-center specific IDLC data that is contained in the far left table, by CLLI code.

Percent IDLC in wire centers for Utah

Utah Wire Centers

http://www.uswest.com/cgi-bin/iconn/dlc.cg

SPVLUTMA	16,559	11,670	3,012	18%
STGRUTMA	55,164	37,192	29,382	53%
TOOLUTMA	20,715	14,083	2,055	10%
VEYOUTMA	2,399	1,839	1,207	50%
WASHUTMA	13,592	9,071	5,736	42%
WJRDUTMA	20,484	13,874	9,497	46%

CLLI Code	Total Loops	Loops in Service	Loops w/ Integrated DLC	% Total Loops on IDLC
ABRDWA01	35,370	20,285	3,222	9%
AUBNWA01	70,348	41,799	13,687	19%
BCKLWA01	5,353	3,874	-	0%
BDMDWA01	6,269	4,285	1,387	22%
BLFRWA01	13,019	9,241	3,589	28%
BLHMWA01	88,346	51,197	23,633	27%
BLHMWALU	2,195	1,679	-	0%
BLLVWAGL	82,094	38,977	6,070	7%
BLLVWASH	96,759	55,103	2,663	3%
BMTNWA01	68,601	45,870	1,132	2%
BNISWA01	21,763	15,614	1,870	9%
BTLGWA01	20,401	12,674	2,777	14%
BYLKWA01	21,204	15,001	2,873	14%
CENLWA01	19,016	12,923	720	4%
CHHLWA01	16,377	9,961	1,697	10%
CLDMWA01	4,553	2,902	-	0%
CLELWA01	6,282	3,923	-	0%
CLFXWA01	4,904	3,070	-	0%
CLVLWA01	14,156	8,428	2,937	21%
COLBWA01	15,292	10,427	189	1%
CRMTWA01	1,415	788	-	0%
CRSBWA01	5,035	3,825	-	0%
CSRKWA01	9,381	5,453	2,557	27%
DESMWA01	29,550	17,338	1,061	4%
DRPKWA01	10,129	6,868	1,890	19%
DYTNWA01	3,789	2,265	-	0%
ELK-WA01	4,441	3,097	-	0%
ENMCWA01	16,422	11,281	1,149	7%
EPHRWA01	7,216	4,703	-	0%
ESTNWA01	1,222	826	-	0%
FDWYWA01	43,245	26,272	2,434	6%
GRBLWA01	4,492	3,286	789	18%
GRHMWAGR	31,897	22,245	15,593	49%
HDPTWA01	4,439	2,795	660	15%
ISQHWAEX	56,336	30,612	22,445	40%
JOYCWA01	2,035	1,433	-	0%
KENTWA01	64,626	37,742	9,184	14%
KENTWAME	39,840	25,634	7,395	19%
KENTWAOB	54,742	20,770	4,479	8%
LACYWA01	76,287	49,308	21,184	28%
LBLKWA01	2,606	1,782	-	0%
LGVWWA02	61,974	38,354	1,709	3%
LNLKWA01	2,507	1,649	-	0%
MPVYWAMV	22,324	14,819	2,373	11%
MRISWA01	22,264	14,916	1,689	8%
MSLKWA01	25,867	15,216	4,909	19%
MSLKWAAB	5,567	3,184	-	0%
NPRTWA01	2,260	1,144	-	0%
NPVNWA01	4,335	2,924	556	13%
NWLKWA01	4,609	2,855	-	0%
OCSHWA01	6,984	4,657	-	0%
OLYMWA02	109,643	56,652	20,125	18%
OLYMWAEV	13,665	8,165	1,169	9%
OMAKWA01	13,336	9,248	1,633	12%

Washington Statistics

% Total Loops on IDLC	10%
Highest % IDLC in Wire Center TACMWAFL	51%
Loops on IDLC	406,591
Total Loops	4,055,146
Loops in COs w/ 20%+ IDLC	561,120

IDLC Concentration	Number of Wire Centers	Number of Loops
0% - 20%	96	3,494,026
21% - 40%	13	500,955
41% - 60%	3	60,165
61% - 80%	0	-
81% - 100%	0	0
Totals	112	4,055,146

Qwest data for Washington shows that, state-wide, 10% of total loops are served by IDLC, with one wire center exhibiting an IDLC concentration of 51%. Out of the total 112 Qwest wire centers in Washington, sixteen (16) wire centers have IDLC concentrations greater than 20% (serving 561,120 loops). Thirteen (13) of these wire centers have IDLC concentrations between 21%-40% and three (3) of these wire centers have IDLC concentrations between 41%-60%. The diagram below depicts the wire-center specific IDLC data that is contained in the far left table, by CLLI code.

Percent IDLC in wire centers for Washington

http://www.uswest.com/cgi-bin/iconn/dlc.cg
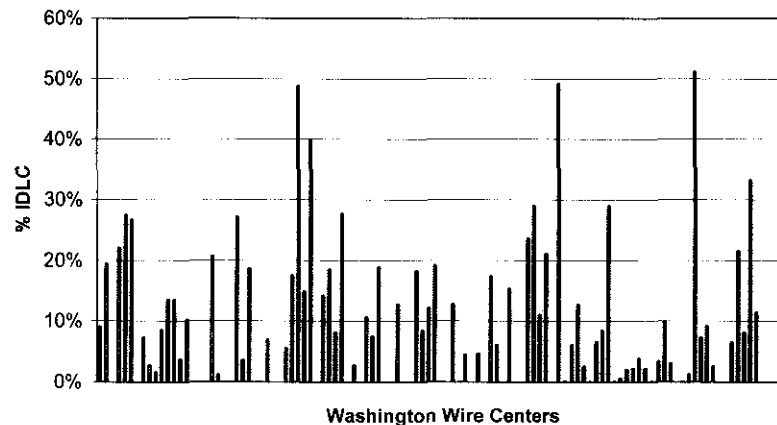
Starkey/Morrison Declaration, Exhibit 7
MCI Comments
WC Docket 04-313
October 4, 2004

ORCHWA01	119,983	67,594	23,066	19%
ORVLWA01	3,987	2,274	-	0%
OTHEWA01	8,465	5,558	-	0%
PASCWA01	41,728	24,576	5,368	13%
PMRYWA01	3,023	1,690	-	0%
PTANWA01	32,948	21,686	1,490	5%
PTLWWA01	4,733	3,231	-	0%
PTORWAFE	25,024	16,941	1,177	5%
PTRSWA01	1,606	922	-	0%
PTTWWA01	20,142	13,693	3,506	17%
PYLPWA01	78,683	49,397	4,820	6%
RDFDWA01	7,210	4,337	-	0%
RNTNWA01	127,007	69,619	19,529	15%
ROCHWA01	9,323	7,235	-	0%
ROY-WA01	3,723	2,996	-	0%
SEQMWA01	24,112	16,567	5,719	24%
SHTNWA01	31,154	19,567	9,045	29%
SLDLWASI	33,959	20,861	3,759	11%
SMNRWA01	19,504	12,396	4,129	21%
SNYSWA01	1,700	1,012	-	0%
SPDLWA01	2,770	1,799	1,364	49%
SPKNWA01	75,493	32,408	88	0%
SPKNWACH	9,398	4,509	576	6%
SPKNWAFA	55,041	30,951	7,050	13%
SPKNWAHD	40,177	23,826	1,041	3%
SPKNWAKY	37,713	21,228	15	0%
SPKNWAMO	19,394	11,687	1,295	7%
SPKNWAWA	93,139	55,479	7,937	9%
SPKNWAWH	49,220	29,089	14,285	29%
STTLWA03	98,787	56,434	166	0%
STTLWA04	85,791	53,838	560	1%
STTLWA05	80,449	42,181	1,709	2%
STTLWA06	234,561	99,852	5,383	2%
STTLWACA	40,522	20,567	1,611	4%
STTLWACH	100,484	57,481	2,274	2%
STTLWADU	54,020	25,161	117	0%
STTLWAEL	53,577	19,817	1,849	3%
STTLWALA	77,733	46,424	7,806	10%
STTLWAPA	43,259	28,683	1,355	3%
STTLWASU	60,448	41,218	-	0%
STTLWAWE	50,762	35,068	61	0%
TACMWAFA	71,199	30,737	894	1%
TACMWAFL	25,498	11,483	13,052	51%
TACMWAGF	56,177	32,911	4,127	7%
TACMWAJU	61,272	36,863	5,649	9%
TACMWALE	60,634	39,840	1,563	3%
TACMWALO	37,862	22,001	-	0%
TACMWASY	33,095	20,625	-	0%
TACMWAWA	19,540	11,610	1,269	6%
TACMWAWV	69,203	41,921	14,933	22%
VANCWA01	80,786	40,627	6,543	8%
VANCWANO	43,968	25,933	14,642	33%
WLWLWA01	43,096	26,769	4,945	11%
WNLCWA01	3,237	2,559	-	0%
WRDNWA01	2,482	1,637	-	0%

WTBGWA01	1,673	907	-	0%
YAKMWA02	78,125	46,820	1,354	2%
YAKMWAVE	29,765	19,828	6,041	20%

CLLI Code	Total Loops	Loops in Service	Loops w/ Integrated DLC	% Total Loops on IDLC
AFTNWYMA	3,849	1,508	-	0%
BFLOWYMA	6,123	4,004	-	0%
CHYNWYMA	76,223	46,905	6,325	8%
CODYWYMA	14,252	9,811	-	0%
CSPRWYMA	70,453	40,816	7,319	10%
DGLSWYMA	8,996	4,720	-	0%
DNRHWYMA	1,499	1,045	-	0%
EVTNWYMA	14,250	7,321	-	0%
GLNDWYMA	562	332	-	0%
GLRKWYMA	3,784	2,020	-	0%
GLTTWYMA	30,755	18,603	169	1%
GNRVWYMA	10,675	6,693	-	0%
JCSNWYMA	27,128	17,632	12,362	46%
KMMRWYMA	5,517	2,427	-	0%
LAKEWYMA	2,232	1,025	-	0%
LARMWYNM	27,194	15,438	-	0%
LNDRWYMA	9,698	7,425	-	0%
LUSKWYMA	2,510	1,585	-	0%
MMTHWYMA	1,491	677	-	0%
MORNWYMA	1,681	719	-	0%
OLFTWYMA	1,296	339	-	0%
POWLWYMA	9,060	5,173	-	0%
RCSPWYMA	24,120	14,547	-	0%
RVTNWYMA	16,482	10,503	-	0%
RWLNWYMA	11,041	6,331	-	0%
SHRDWYMA	23,124	14,110	-	0%
STRYWYMA	993	766	-	0%
WHLDWYMA	6,491	3,642	-	0%
WRGHWYMA	3,023	1,201	-	0%

Wyoming Statistics	
% Total Loops on IDLC	6%
Highest % IDLC in Wire Center JCSNWYMA	46%
Loops on IDLC	26,175
Total Loops	414,502
Loops in COs w/ 20%+ IDLC	27,128

IDLC Concentration	Number of Wire Centers	Number of Loops
0% - 20%	28	387,374
21% - 40%	0	-
41% - 60%	1	27,128
61% - 80%	0	-
81% - 100%	0	0
Totals	29	414,502

Qwest data for Wyoming shows that, state-wide, 6% of total loops are served by IDLC, with one wire center exhibiting an IDLC concentration of 46%. Out of the total 29 Qwest wire centers in Wyoming, one (1) wire center has an IDLC concentration of between 21%-40% (serving 27,128 loops). The diagram below depicts the wire-center specific IDLC data that is contained in the far left table, by CLLI code.

Percent IDLC in wire centers for Wyoming
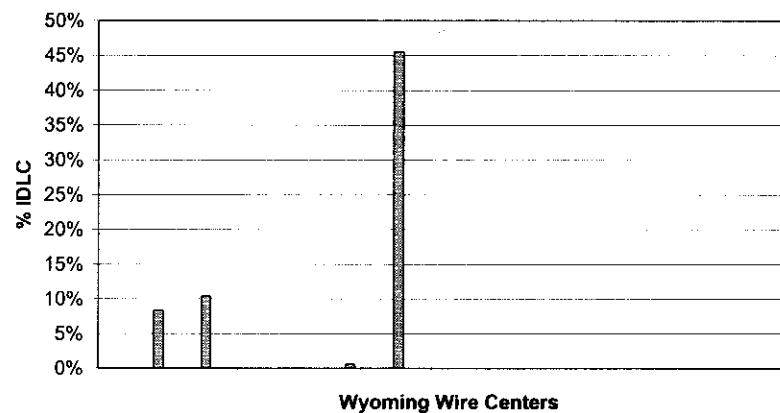
http://www.uswest.com/cgi-bin/iconn/dlc.cg

MICHAEL STARKEY AND SIDNEY MORRISON DECLARATION

EXHIBIT 8

UNBUNDLING SOLUTIONS DOCUMENTATION

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DSC
COMMUNICATIONS

Unbundling Solutions

The Challenge

One of the three key principle goals set forth by the Telecom Act of 1996 is "opening of the local exchange and exchange access markets to competitive entry". This has created a demand for low-risk, low-cost, easily implementable solutions that support continued profitability.

Section 251 of the legislation imposes specific obligations on telecommunication carriers including, Sec 251 (c), which states that an ILEC must provide to any requesting telecommunication carrier, LEC retail services for resale to at wholesale rates and interconnection and access to network elements on an unbundled basis at any technically feasible point. Network Elements are defined as a facility or equipment used in the provision of a telecommunication service. Interconnection refers to the physical linking of two networks for mutual exchange of traffic. One of the technically feasible points is the local loop, defined in the Act as a transmission facility between the distribution frame of the ILECs Central Office and the NID.

Unbundling of the local loop is essentially the leasing of the local loop facility from the end office to the subscriber. The type of loops include: 2&4 wire analog voice grade, 2&4 wire unconditioned loops supporting ISDN, ADSL, HDSL, LNP and DS1 signals.
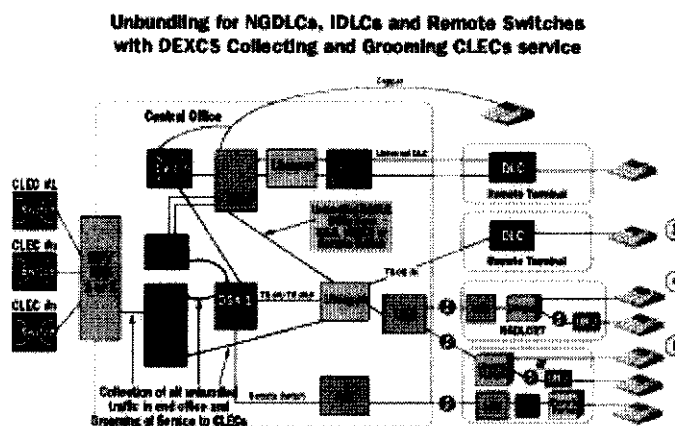

Unbundling: Five methods of providing local loop access
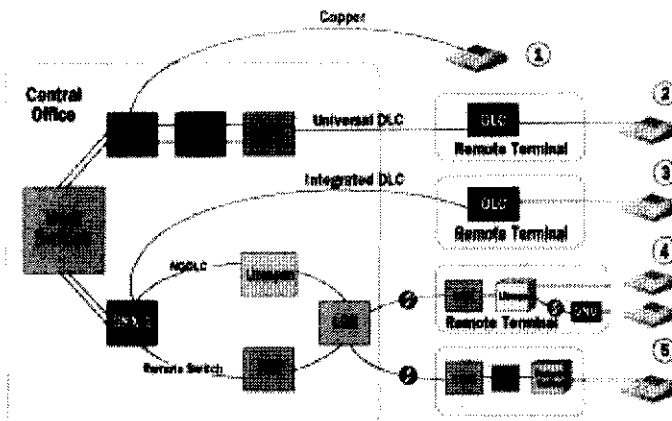
Service is provided to the local loop over one of five different and distinctly

different technical means. The five different methods of providing local loop terminations are:

1. Host Switch, direct VF terminations
2. Universal Digital Loop Carrier VF terminations
3. Integrated Digital Loop Carrier Digital terminations
4. Integrated Digital Loop Carrier Digital terminations
5. Remote Switch terminations

All five methods of service delivery provide equivalent service to subscribers, but are impacted differently when required to be unbundled.

There is no problem with unbundling of a host switch and universal Digital Loop Carrier VF termination since they appear directly on the MDF in the most basic form, at the VF level. In some ILECs as much as 40% of the existing loops are digitally derived. The problem with digital derived switch interfaces, however, is that they do not allow for unbundled access to the individual subscriber loops in the central office.

Unbundling for NGDLCs, IDLCs and Remote Switches with DEXCS Collecting and Grooming CLECs service

DSC Unbundling Solutions

Unbundling for Integrated Digital Loop Carriers can be performed by utilizing the DSC Litespan Next Generation Digital Loop Carrier (NGDLC) with its Time Slot Interchanger. The TSI allows "mapping" of the DSOs in the digital interface to be mapped to an analog interface. Any of the subscribers that remain terminated in the ILECs domain are digitally interfaced, same as before. The subscriber making the transition to the CLEC can be "mapped" to a VF circuit at the MDF for re-route. By implementing the Litespan NGDLC, only the required unbundled derived loops have to be treated. The only other option is to deploy Central Office terminals to gain VF access of a digitally terminated subscriber. In many cases, switch expansion and switch re-balancing must occur to support the treatment of the IDLC unbundled loops by implementing a COT.

Remote switches present a different problem. Remote switches are placed to

provide service and are connected to the host serving switch with a proprietary digital umbilical link. This link is concentrated with the remote switch taking an appearance as an extended line peripheral bay off the host switch. Any unbundled loop request will require the "nailing up" of the derived loop. The circuit is nailed up over the umbilical link and also through the switch fabric eventually to the MDF. To support unbundling in the remote switch option, a Litespan Remote Terminal or Starspan Optical Network Unit can be placed with the remote switch. The local loops required to be unbundled are transferred to the Litespan system for MDF access in the host serving office.

Implementing a Litespan solution is the most effective way of providing unbundled loop access to digitally derived local loops. Another key benefit is the capability to provide "flow through" service order provisioning with the established loop OS systems. This includes the capability to provide Metallic Loop Testing (MLT) of any unbundled loop.

Unbundling for NGDLCs, IDLCs and Remote Switches
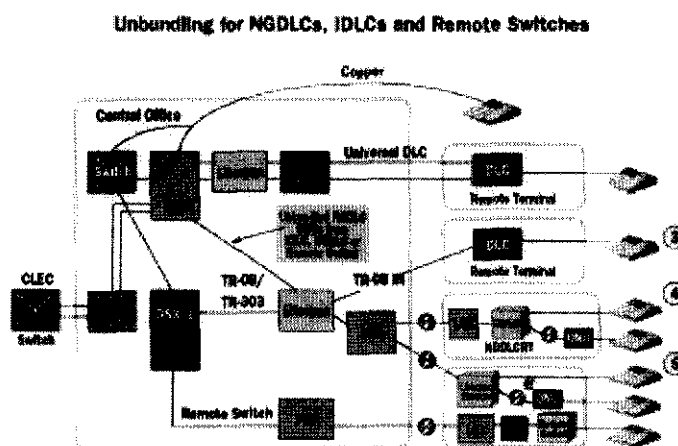
The second part of unbundling support is the mapping of the unbundled loops into the transport and IOF network. This critical network component is supported by the DSC DEXCS platform. The DSC DEXCS used in conjunction with Litespan addresses both: terminating and routing traffic from multiple CLECs into the end office; and collecting and routing traffic from the end office to a hub office where multiple CLECs are co-located.

In the end office domain, the DEXCS collects the service at a DS1 or TR-008 interface level and provides the capability to re-route the unbundled loops in a digital format to the required CLEC. DEXCS is compatible with IOF testing methods.

There is also the option of implementing the DEXCS at a hub site in which a single collection point of unbundled traffic from the end offices occurs. At this hub office, the DEXCS can terminate DS1 traffic (DS1 or TR-008 formatted), DS3 or at a STS-1 interface. The DEXCS provides DS0 observation and mapping of the unbundled loop to any CLEC that has an appearance in the hub office.

The DSC unbundling solutions are also supported by the foundation Operational Support Systems (OSS) deployed today. The access network is maintained and provisioned by OSSs designed to log data and support the service delivery of a mass market offering. The transport network OSSs differ in that they were designed to maintain records from the serving wire center, to the Inter Office Facilities (IOF) domain and to the terminating wire center. The OSSs bond since they both link at the point of interconnection as the services transverse each domain.

Unbundling for NGDLCs and IDLCs
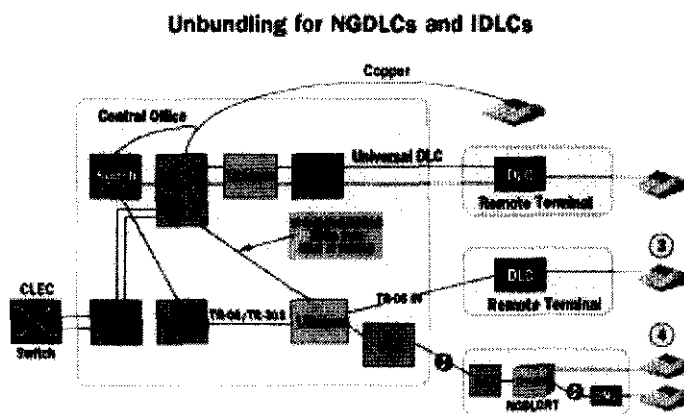
The DSC product offerings for support of the unbundling provide key benefits including:

- Complete TSI capability to support grooming, routing and mapping of the unbundled loop.
- Network compliant interfaces of:VF interface (2 wire & 4 wire), ISDN, DS1, TR-008, GR-303, and DS3 rate.
- Tested interoperability with established TR-008 DLCs
- Embedded Operational Support capabilities of both the loop and Inter-Office environment for end to end flow through order capabilities and testing.
- Software controlled network elements supporting new and merging services including SDSL, HDSL, LNP and ADSL.
- Opportunity to increase the Return On Net Assets of existing infrastructure by implementing other DSC Asset Value Drivers on Litespan and DEXCS platform.
- Network solution supporting the initial demand for unbundling and future opportunity to transition unbundled loop to other CLECs, or back to the ILEC domain on a remote order provisioning basis.

Return to find the DSC Solution for your challenge...